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10 Attorneys for Defendant
11 Charles Schwab & Co., Inc.

12 JACQUELINE ANDERSON,

13 Plaintiff,

14 vs.

15 CHARLES SCHWAB AND COMPANY, INC.,
16 and DOES 1 through 100, inclusive,

17 Defendants.

18 No.: 3:12-cv-01682-MMC

19 **STIPULATION AND [PROPOSED] ORDER**
20 **EXTENDING DEFENDANT CHARLES**
21 **SCHWAB & CO., INC.'S TIME TO**
22 **RESPOND TO COMPLAINT**

23 *Hon. Maxine M. Chesney*

1 Plaintiff Jacqueline Anderson (“Plaintiff”) and Defendant Charles Schwab & Co., Inc.
2 (“Defendant”), by and through their undersigned counsel of record, hereby stipulate as follows:

3 WHEREAS, on January 11, 2013, the parties filed a Stipulation and [Proposed] Order
4 seeking leave for Plaintiff’s filing of a Third Amended Complaint [Doc 19];

5 WHEREAS, on January 15, 2013, this Court granted Plaintiff leave to file a Third Amended
6 Complaint [Doc. 20];

7 WHEREAS, on January 17, 2013, Plaintiff filed a Third Amended Complaint [Doc. 21];

8 WHEREAS, the Third Amended Complaint contains 270 separate and distinct paragraphs;

9 WHEREAS, Defendant intends to file an answer to the Third Amended Complaint;

10 WHEREAS, the parties stipulated to, and the court granted, an extension of Defendant’s time
11 to file its answer to March 1, 2013 [Docs. 22, 24]

12 WHEREAS, Defendant will be unable to complete its Answer by March 1, 2013;

13 WHEREAS, an extension of time will not affect the case management schedule for this
14 action; and

15 WHEREAS, the instant Stipulation and [Proposed] Order constitutes the parties’ second
16 request for a time modification in this action.

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18 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by Plaintiff and
19 Defendant that:

20 Pursuant to this stipulation, the parties agree to continue Defendant’s deadline to file its
21 responsive pleading to the Third Amended Complaint from March 1, 2013 to March 15, 2013.

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23 SO STIPULATED.

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2 DATED: February 28, 2013 REED SMITH, LLP
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4 By: /s/ Tiffany Renee Thomas
5 Deborah J. Broyles
6 Tiffany Renee Thomas
7 Attorneys for Defendant Charles Schwab & Co., Inc.
8

9 DATED: February 28, 2013 Law Offices of Murlene J. Randle
10

11 By: /s/ Murlene J. Randle
12 Murlene J. Randle
13 Attorneys for Plaintiff Jacqueline Anderson
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15
16 ORDER
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18 Pursuant to the stipulation of the parties and good cause appearing, IT IS HEREBY
19 ORDERED THAT Defendant Charles Schwab & Co., Inc. must file a responsive pleading to
20 Plaintiff Jacqueline Anderson's Third Amended Complaint no later than March 15, 2013. Given the
21 limited nature of the amendments, however, said extension shall not constitute good cause to amend
22 the Pretrial Preparation Order in any manner.

23 IT IS SO ORDERED.
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25 Dated: February 28, 2013
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The Honorable Maxine Chesney
United States District Judge